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WILLKIE FARR & GALLAGHER LLP

1875 K Street, NW
Washington, DC 20006

Tel: 202 303 1000
Fax: 202 303 2000

September 20, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Room TW-325
445 12th Street, S.W.
Washington D.C. 20554

Re: Qwest Petition for Forbearance Under 47 U.S.C. § 160(c) from Title II and Computer Inquiry Rules with Respect to Broadband Services; WC Docket No. 06-125

Dear Ms. Dortch:

Time Warner Telecom Inc. (“TWTC”), hereby responds to the FCC’s public notice seeking comment on the Qwest Petition for Forbearance filed in WC Dkt. No. 06-125.¹

After withdrawing its initial petition for forbearance from consideration on September 11, 2007, Qwest refiled a nearly identical petition on September 12, 2007. Therefore, TWTC has enclosed as its opposition to Qwest’s refiled petition, TWTC’s initial opposition to Qwest’s original petition as well as subsequent ex partes and pricing charts comparing TWTC’s and Qwest’s wholesale OCn and Ethernet rates.² As those filings demonstrate, Qwest continues to retain and exercise market power over the bottleneck facilities necessary to provide packet-switched and OCn services. For the reasons explained in the enclosed attachments, the FCC should deny Qwest’s petition.

¹ *Pleading Cycle Established For Comments On Qwest Petition For Forbearance Under 47 U.S.C. § 160(c) From Title II and Computer Inquiry Rules With Respect to Broadband Services*, Public Notice, DA 07-3923 (rel. Sept. 13, 2007).

² When TWTC originally filed its charts comparing Qwest’s and TWTC’s OCn pricing on August 24, 2007, TWTC’s 36 month OC12 discount rate for all mileages was not accurate. That error has been corrected in the enclosed version of the charts.

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Respectfully submitted,
/s/

Thomas Jones
Jonathan Lechter
Karen Henein

WILLKIE FARR & GALLAGHER LLP
ATTORNEYS FOR TIME WARNER TELECOM INC.